Other rules, however, have been adopted in other jurisdictions. For instance, the cost of re-seeding the meadow, and its rental value until it is restored to its former condition have been allowed. *Railway Co.* v. *Jones,* 59 Ark. 105, 26 S. W. 595; *The P., C. & St. L. Ry. Co.* v. *Hixon,* 110 Ind. 225, 11 N. E. 285. The market value of the crop when matured, less the cost of producing, harvesting, and marketing, has sometimes been recovered. *Smith* v. *Railroad Co.,* 38 Iowa 518; *Shotwell* v. *Dodge,* 8 Wash. 337, 36 Pac. 254. In addition to the value of the crop destroyed, plaintiff has been permitted to receive (1) the cost of restoring the meadow to its former condition, *Bradley* v. *Iowa Central Ry. Co.,* 111 Iowa 562, 82 N. W. 996; (2) compensation for services in preventing further injury, *Mo. Pac. Ry. Co.* v. *Ricketts,* 45 Kan. 617, 26 Pac. 50; (3) interest on the value from the time of destruction until verdict, *Clark* v. *Bank,* 6 Houst. (Del.) 584; *Lampley* v. *Atlantic Coast Line R. R. Co.,* 63 S. C. 462, 41 S. E. 517. In case of a permanent injury to the land the difference in value of the premises before and after the fire may be recovered. *Wiggins* v. *Railroad,* 119 Mo. App. 492, 95 S. W. 311; *F. W. & N. O. Ry Co.* v. *Wallace,* 74 Tex. 581, 12 S. W. 227. But in the principal case plaintiff could get nothing for injuries to the inheritance because he was only lessee and therefore had no interest in it.

EVIDENCE—ADMISSIBILITY OF A DEED AS AN ANCIENT DOCUMENT.—Defendant offered in evidence a deed, as an ancient instrument. It was shown to be more than thirty years old and one of a kind which the law required to be kept in the public archives. But it was found among the papers of one of the grantees in possession of his daughter. *Held,* that this deed could be admitted as an ancient instrument. *Frugia et al.* v. *Trueheart et al.* (1908), — Tex. Civ. App. —, 106 S. W. Rep. 736.

One of the requirements in order that such an instrument can be admitted without proof of execution, is that it be found in a proper custody. *Whitman* v. *Heneberry,* 73 Ill. 109; *Whitman* v. *Shaw,* 166 Mass. 451. But a proper custody need not be the usual one, as was said in *Croughton* v. *Blake and others,* 12 M. & W. 205. In order to render a written document admissible it is not necessary to show that it has come from the most proper custody. *Bishop of Meath* v. *Winchester,* 3 Bing. N. C. 183. It is sufficient if it comes from a place where it might reasonably be expected to be found. What is proper custody is a question for the court. *Rees* v. *Walters,* 3 M. & W. 527.

EVIDENCE—ADMISSIONS IN PLEADING.—Defendant offered as an admission the reply of the plaintiff, which had later been amended by cutting out the allegation containing the admission. *Held,* the part removed from the pleading by the amendment is out of the case and cannot be treated as an admission of the party pleading it. *Kersten* v. *Weichman et al.* (1908), — Wis. —, 114 N. W. Rep. 499.

The decision can hardly be reconciled with the former Wisconsin case of *Norris* v. *Cargill,* 57 Wis. 251. It is in harmony with *Smith* v. *Davidson,* 41 Fed. 172; *Holland* v. *Rogers,* 33 Ark. 251; *Mecham* v. *McKay,* 37 Cal. 154;